

### **REMARKS**

This response is intended as a full and complete response to the Office Action mailed on March 1, 2006. In view of the following discussion, the Applicants believe that all claims are in allowable form.

### **CANCELLATION OF CLAIMS**

The Applicants have cancelled claims 20-25 without prejudice. The Applicants reserve the right to file continuing and/or divisional applications to further prosecute the cancelled subject matter.

### **CLAIM REJECTIONS**

#### **35 U.S.C. §102      Claims 1 and 8-10**

Claims 1 and 8-10 stand rejected under 35 U.S.C. § 102(a) as being anticipated by United States Patent Publication No. 2003/0118732 published June 26, 2003 to *Stevens, et al.* (hereinafter referred to as *Stevens*). The Applicants respectfully disagree.

Independent claim 1 recites elements not taught or suggested by *Stevens*. *Stevens* teaches a substrate support 212 includes a substrate receiving surface 214 having apertures 226 formed therein. (*Stevens*, Paragraphs 25, Lines 7-27.) *Stevens* does not teach or suggest a substrate support having a base member and a fluid diffusion member sealably positioned to the base member and defining a fluid volume therebetween, the fluid diffusion member having a plurality of radially positioned bores formed therethrough, as recited in claim 1.

Thus, the Applicants submit that independent claims 1 and claims 8-10 depending therefrom, are patentable over *Stevens*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

**35 U.S.C. §103      Claims 2 and 3**

Claims 2 and 3 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over *Stevens* in view of United States Patent No. 5,566,744 issued October 22, 1996 to *Tepman*, (hereinafter referred to as "*Tepman*") and United States Patent No. 6,239,038 issued May 29, 2001 to *Wen, et al.* (hereinafter referred to as "*Wen*"). The Applicants respectfully disagree.

Independent claim 1, from which claims 2 and 3 depend, recites elements not taught or suggested by the combination of *Stevens*, *Tepman*, and *Wen*. The teaching of *Stevens* has been discussed above. *Tepman* teaches a fluid transfer conduit 308 used to feed fluid to a substrate surface. *Wen* teaches a fluid heater 54 utilized to heat the processing fluid supplied through a fluid conduit 32. *Tepman* and *Wen* fail to suggest a modification to *Stevens* that would yield a substrate support having a base member and a fluid diffusion member sealably positioned to the base member and defining a fluid volume therebetween, the fluid diffusion member having a plurality of radially positioned bores formed therethrough, as recited in claim 1. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the limitations recited by claim 1.

Thus, the Applicants submit that claims 2-3, that depend from claim 1, are patentable over *Stevens* in view of *Tepman* and *Wen*. Accordingly, the Applicants respectfully request that the rejection be withdrawn and the claims allowed.

**35 U.S.C. §103      Claims 4 and 5**

Claims 4 and 5 stand rejected under U.S.C. § 103(a) as being unpatentable over *Stevens* in view of *Wen*. The Applicants respectfully disagree.

Independent claim 1, from which claims 4 and 5 depend, recites elements not taught or suggested by the combination of *Stevens* and *Wen*. The teaching of *Stevens* has been discussed above. *Wen* teaches an adjustable beveled finger 42 disposed in a sidewall 16 of a processing chamber to secure a substrate disposed on a substrate support. *Wen* fails to teach or suggest a modification to *Stevens* that would yield a substrate support having a base member and a fluid diffusion member sealably

positioned to the base member and defining a fluid volume therebetween, the fluid diffusion member having a plurality of radially positioned bores formed therethrough, as recited in claim 1. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the limitations recited by claim 1.

Thus, the Applicants submit that claims 4 and 5, that depend from claim 1, are patentable over the combination of *Stevens* and *Wen*. Accordingly, the Applicants respectfully request the rejection be withdrawn and claims allowed.

### **35 U.S.C. §103      Claims 6 and 7**

Claims 6 and 7 stand rejected under U.S.C. § 103(a) as being unpatentable over *Stevens* in view of United States Patent Publication No. 2002/0195128 published December 26, 2002, to *Shibagaki* (hereinafter referred to as "*Shibagaki*"). The Applicants respectfully disagree.

Independent claim 1, from which claims 6 and 7 depend, recites elements not taught or suggested by the combination of *Stevens* and *Shibagaki*. The teaching of *Stevens* has been discussed above. *Shibagaki* teaches different configurations of injection ports 51 disposed in a center portion of a substrate support. *Shibagaki* fails to teach or suggest a modification to *Stevens* that would yield a substrate support having a base member and a fluid diffusion member sealably positioned to the base member and defining a fluid volume therebetween, the fluid diffusion member having a plurality of radially positioned bores formed therethrough, as recited in claim 1. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the limitations recited by claim 1.

Thus, the Applicants submit that claims 6 and 7 are patentable over the combination of *Stevens* and *Shibagaki*. Accordingly, the Applicants respectfully request the rejection be withdrawn and claims allowed.

**35 U.S.C. §103      Claim 11**

Claim 11 stands rejected under U.S.C. § 103(a) as being unpatentable over *Stevens* in view of United States Patent No. 5,294,778 issued March 15, 1994, to *Carman, et al.* (hereinafter referred to as "*Carman*"). The Applicants respectfully disagree.

Independent claim 1, from which claim 11 depends, recites elements not taught or suggested by the combination of *Stevens* and *Carman*. The teaching of *Stevens* has been discussed above. *Carman* teaches multiple heaters 54 disposed in a lower side of a substrate support to heat a substrate disposed thereon. *Carman* fails to teach or suggest a modification to *Stevens* that would yield a substrate support having a base member and a fluid diffusion member sealably positioned to the base member and defining a fluid volume therebetween, the fluid diffusion member having a plurality of radially positioned bores formed therethrough, as recited in claim 1. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the limitations recited by claim 1.

Thus, the Applicants submit that claim 11, that depends from claim 1, is patentable over the combination of *Stevens* and *Carman*. Accordingly, the Applicants respectfully request the rejection be withdrawn and claims allowed.

**35 U.S.C. §103      Claims 12 and 18**

Claims 12 and 18 stand rejected under U.S.C. § 103(a) as being unpatentable over *Stevens* in view of *Wen* and *Shibagaki*. The Applicants respectfully disagree.

Independent claim 12, from which claim 18 depends, recites elements not taught or suggested by the combination of *Stevens*, *Wen* and *Shibagaki*. The teaching of *Stevens* has been discussed above. *Shibagaki* teaches different configurations of injection ports 51 disposed in a center portion of a substrate support, as set forth above. *Wen* teaches an adjustable beveled finger 42 disposed in a sidewall 16 of a processing chamber to secure a substrate disposed on a substrate support. However, *Wen* and *Shibagaki* fail to teach or suggest a modification to *Stevens* that would yield a substrate support having a base member and a fluid diffusion member having a plurality of fluid dispensing bores formed through an upper surface thereof, the plurality of bores being

arranged in a annular patterns about a central axis of the fluid diffusion member, and at least one substrate support arm extending inwardly over the upper surface of the fluid diffusion member, the at least one substrate support arm being configured to support a substrate parallel relationship to an upper surface of the fluid diffusion member in a face up orientation, as recited in claim 12. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the limitations recited by claim 12.

Thus, the Applicants submit that independent claim 12, and claim 18 depending therefrom, are patentable over the combination of *Stevens*, *Wen* and *Shibagaki*. Accordingly, the Applicants respectfully request the rejection be withdrawn and claims allowed.

### **35 U.S.C. §103      Claims 13-17**

Claims 13-17 stand rejected under U.S.C. § 103(a) as being unpatentable over *Stevens* in view of *Wen* as applied to claim 12 and further in view of and *Tepman*. The Applicants respectfully disagree.

Independent claim 12, from which claims 13-17 depend, recites elements not taught or suggested by the combination of *Stevens*, *Wen* and *Tepman*. The teaching of *Stevens* has been discussed above. *Wen* teaches a fluid heater 54 utilized to heat the processing fluid supplied through a fluid conduit 32. *Tepman* teaches a fluid transfer conduit 308 used to feed fluid to a substrate surface. However, *Wen* and *Tepman* fail to teach or suggest a modification to *Stevens* that would yield a substrate support having a base member and a fluid diffusion member having a plurality of fluid dispensing bores formed through an upper surface thereof, the plurality of bores being arranged in a annular patterns about a central axis of the fluid diffusion member, and at least one substrate support arm extending inwardly over the upper surface of the fluid diffusion member, the at least one substrate support arm being configured to support a substrate parallel relationship to an upper surface of the fluid diffusion member in a face up orientation, as recited in claim 12. Thus, a *prima facie* case for obviousness has not been established as the references fail to teach or suggest all the limitations recited by claim 12.

Thus, the Applicants submit that claims 13-17, that depend from claim 12, are patentable over the combination of *Stevens*, *Wen* and *Tepman*. Accordingly, the Applicants respectfully request the rejection be withdrawn and claims allowed.

**35 U.S.C. §103      Claim 19**

Claim 19 stands rejected under U.S.C. § 103(a) as being unpatentable over *Stevens* in view of *Wen* and further in view of *Carman*. The Applicants respectfully disagree.

Independent claim 12, from which claim 19 depends, recites elements not taught or suggested by the combination of *Stevens*, *Wen* and *Carman*. The teaching of *Stevens* has been discussed above. *Wen* teaches a fluid heater 54 utilized to heat the processing fluid supplied through a fluid conduit 32. *Carman* teaches multiple heaters 54 disposed in a lower side of a substrate support to heat a substrate disposed thereon. *Carman* fails to teach or suggest a modification to *Stevens* and *Wen* that would yield a substrate support having a base member and a fluid diffusion member having a plurality of fluid dispensing bores formed through an upper surface thereof, the plurality of bores being arranged in a annular patterns about a central axis of the fluid diffusion member, and at least one substrate support arm extending inwardly over the upper surface of the fluid diffusion member, the at least one substrate support arm being configured to support a substrate parallel relationship to an upper surface of the fluid diffusion member in a face up orientation, as recited in claim 12.

Thus, the Applicants submit that claim 19, that depends from claim 12, is patentable over the combination of *Stevens* and *Carman*. Accordingly, the Applicants respectfully request the rejection be withdrawn and claims allowed.

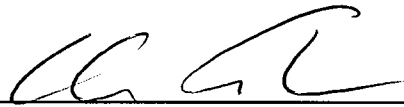
**CONCLUSION**

Thus, the Applicants submit that all claims now pending are in condition for allowance. Accordingly, both reconsideration of this application and swift passage to issue are earnestly solicited.

If the Examiner believes that any unresolved issues still exist, it is requested that the Examiner telephone Keith Taboada at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

June 5, 2006  
Date

  
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